

MARK BROOKS
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March 20, 2012

Ana Escobar, Esq.
Metropolitan Clerk
205 Metropolitan Courthouse
Nashville, TN 37201

Re: Complaint against Members of Board of Education
Metro Code Chapter 2.222

Dear Ms. Escobar:

I am enclosing for your attention a Complaint filed by Mr. Doug Collier with the Metropolitan Board of Ethical Conduct against the members of the Metro Nashville Board of Education for violations of Metro Code Chapter 2.222. Mr. Collier is filing this Complaint pursuant to Metro Code § 2.222.040(C)(1).

Please advise me concerning all scheduling arrangements for meetings and hearings by the Board of Ethical Conduct in this matter.

Sincerely,

Mark Brooks

cc: Doug Collier

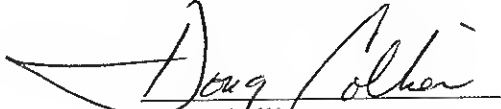
**BEFORE THE BOARD OF ETHICAL CONDUCT OF METROPOLITAN
NASHVILLE AND DAVIDSON COUNTY**

**Complaint against Members of the Metropolitan Nashville Board
of Education Pursuant to Metro Code Chapter 2.222**

1. I, Doug Collier, hereby submit this complaint that the elected members of the Metropolitan Board of Public Education have violated Chapter 2.222 of the Metro Code by failing to file annual disclosure statements and benefit reports with Metro Government.
2. I am a legal resident of Metro Nashville and Davidson County. My current mailing address is 521 Central Avenue, Nashville, TN 37211. I am the President of Service Employees International Union Local 205.
3. I am filing this complaint against the following members of the Board of Education: Gracie Porter, Chairman; Sharon Dixon Gentry; Jo Ann Brannon; Mark North; Anna Shepherd; Cheryl D. Mayes; Edward T. Kindall; Michael W. Hayes; and Kay Simmons.
4. The foregoing members of the Board of Education have failed to file any Annual Disclosure Statements or Annual Benefit Reporting Statements with the Metropolitan Clerk, as required by Chapter 2.222 of the Metro Code.
5. I am attaching to this complaint a true copy of email correspondence from the Metro Clerk establishing that the members of the Board of Education have filed no annual disclosure reports with the Clerk. Based upon this information, I believe that the current members of the Board of Education have never filed disclosure reports under Metro Code Chapter 2.222.
6. Section 2.222.030(A)(4) provides that Annual Disclosure Statements and Annual Benefit Reporting Statements must be filed by "the holders of all elected offices authorized or created by the Metropolitan Charter."
7. The Board of Education was created by Article 9 of the Metro Charter. Metro Charter § 9.02 provides for the election of nine members to the Board of Education. The members of the Board of Education are therefore holders of elected offices authorized and created by the Metro Charter, as provided by § 2.222.030.
8. By failing to file the required disclosure statements, the members of the Board of Education have violated Metro Code Chapter 2.222.
9. I therefore respectfully request that the Metropolitan Board of Ethics conduct a hearing on this complaint, and thereafter require all members of the Board of Education to properly file all required disclosure statements with the Metro Clerk. I also request that the Board of

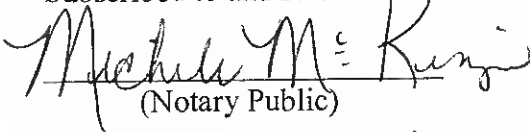
Ethics take all other appropriate actions in this matter, as specified by Metro Code §§ 2.222.040(C)(3) and 2.222.050.

Respectfully submitted,


Doug Collier

State: Tennessee
County: Davidson

Subscribed to and sworn to before me on this 19th day of March 2012.


(Notary Public)

My commission expires March 3, 2015.



Mark Brooks

From: Escobar, Ana (Metro Clerk) [Ana.Escobar@nashville.gov]
Sent: Wednesday, March 07, 2012 12:55 PM
To: 'Mark Brooks'
Subject: RE: Public records request

They have not filed. You might want to check with the Election Commission as to whether or not they file something there.

Thanks,

Ana L. Escobar, Esq.
Metropolitan Clerk
Metropolitan Nashville – Davidson County
P.O. Box 196321
Nashville, TN 37219-6321
615-862-6770
Ana.Escobar@nashville.gov

From: Mark Brooks [mailto:mark.brooks@isdn.net]
Sent: Wednesday, March 07, 2012 11:36 AM
To: Escobar, Ana (Metro Clerk)
Subject: RE: Public records request

Thank you. Have any of them filed disclosure forms in the past?

MB

From: Escobar, Ana (Metro Clerk) [mailto:Ana.Escobar@nashville.gov]
Sent: Wednesday, March 07, 2012 11:28 AM
To: 'Mark Brooks'
Subject: RE: Public records request

Mr. Brooks,. I am sorry for the delay – we had a council meeting last night.

None of the people you listed have returned the Disclosure form for 2011.

Ana L. Escobar, Esq.
Metropolitan Clerk
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P.O. Box 196321
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From: Mark Brooks [mailto:mark.brooks@isdn.net]
Sent: Tuesday, March 06, 2012 5:21 PM

To: Escobar, Ana (Metro Clerk)
Subject: RE: Public records request

Of course. Names of current members are below.

Thanks again!

Mark Brooks

- Sharon Gentry
- Jo Ann Brannon
- Mark North
- Anna Shepherd
- Gracie Porter
- Cheryl D. Mayes
- Edward T. Kindall
- Michael W. Hayes
- Kay Simmons

From: Escobar, Ana (Metro Clerk) [mailto:Ana.Escobar@nashville.gov]
Sent: Tuesday, March 06, 2012 5:06 PM
To: 'Mark Brooks'
Subject: RE: Public records request

Could you tell me some names and I will look it up?

Ana L. Escobar, Esq.
Metropolitan Clerk
Metropolitan Nashville – Davidson County
P.O. Box 196321
Nashville, TN 37219-6321
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From: Mark Brooks [mailto:mark.brooks@isdn.net]
Sent: Tuesday, March 06, 2012 5:06 PM
To: Escobar, Ana (Metro Clerk)
Subject: RE: Public records request

Ms. Escobar:

Can you tell me if any of the members of the Board of Education have filed disclosure statements? I note that Metro Code 2.222.030(A)(4) states that the disclosure ordinance applies to "the holders of all elected offices authorized or created by the Metropolitan Council."

Thank you for your assistance.

Mark Brooks

From: Escobar, Ana (Metro Clerk) [mailto:Ana.Escobar@nashville.gov]
Sent: Tuesday, February 28, 2012 10:02 AM
To: 'Mark Brooks'
Subject: RE: Public records request

Mr. Brooks, thank you for your email. We did get 2010 and 2011 in February. Please let me know if you need anything.

Ana L. Escobar, Esq.
Metropolitan Clerk
Metropolitan Nashville – Davidson County
P.O. Box 196321
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Ana.Escobar@nashville.gov

From: Mark Brooks [mailto:mark.brooks@isdn.net]
Sent: Monday, February 27, 2012 12:47 PM
To: Escobar, Ana (Metro Clerk)
Subject: RE: Public records request

Ms. Escobar:

I understand that Dr. Register may have recently filed his 2010 and 2011 disclosure statements.

I would be grateful if you could send copies to me, including any attachments.

Thank you for your kind assistance.

Mark Brooks

From: Escobar, Ana (Metro Clerk) [mailto:Ana.Escobar@nashville.gov]
Sent: Friday, February 10, 2012 1:42 PM
To: 'Mark Brooks'
Cc: Fuller, Marlene (Metro Clerk)
Subject: RE: Public records request

Mr. Brooks: Thank you for your email. Dr. Register has not filed a disclosure statement for 2010 or 2011. Please let us know if we can help you with anything else.

Ana L. Escobar, Esq.
Metropolitan Clerk
Metropolitan Nashville – Davidson County
P.O. Box 196321
Nashville, TN 37219-6321

615-862-6770

Ana.Escobar@nashville.gov

From: Mark Brooks [mailto:mark.brooks@isdn.net]
Sent: Thursday, February 09, 2012 7:02 PM
To: Escobar, Ana (Metro Clerk)
Subject: RE: Public records request

Ms. Escobar:

I would be grateful if you could send to me a copy of Dr. Register's disclosure statement for 2011.

Could you also advise me whether Dr. Register has yet filed the disclosure statement for 2010?

Thank you for your kind assistance.

Mark Brooks

From: Escobar, Ana (Metro Clerk) [mailto:Ana.Escobar@nashville.gov]
Sent: Tuesday, January 10, 2012 2:02 PM
To: 'Mark Brooks'
Subject: RE: Public records request

Mr. Brooks, Thank you for your email. We do not have a disclosure for Mr. Register for 2010. Attached you will find his disclosure for 2009. It is my understanding that he started working in Nashville in 2009. Please feel free to contact us after January 31st to ensure that you receive the disclosure for 2011. Thank you,

Ana L. Escobar, Esq.
Metropolitan Clerk
Metropolitan Nashville – Davidson County
P.O. Box 196321
Nashville, TN 37219-6321
615-862-6770
Ana.Escobar@nashville.gov

From: Mark Brooks [mailto:markbrooks@uwua.net]
Sent: Tuesday, January 10, 2012 1:23 PM
To: Escobar, Ana (Metro Clerk)
Subject: Public records request

Dear Ms. Escobar:

As discussed, I am writing to request one copy of all annual disclosure statements filed by Dr. Jesse Register since his employment by Metro Government, including any amendments to such statements.

I assume all routine copying costs incurred by my request. If the documents are available in electronic format, I would be grateful if you could email copies to me. Otherwise, please mail them to me at the following address.

In addition, I would be grateful if you could send to me a copy of Dr. Register's disclosure statement for 2011 once it is filed, although I will be happy to renew my request after the end of the month.

Thanks again for your kind assistance, and please let me know if you have any questions concerning my request.

Sincerely,

Mark Brooks
Attorney

521 Central Avenue
Nashville, TN 37211

615.259.1186 (tel)
615.523.2350 (fax)